

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GEIGTECH EAST BAY LLC,

Plaintiff,

v.

LUTRON ELECTRONICS CO., INC.,  
Defendant.

Civil Action No. 1:18-cv-05290

**JURY TRIAL DEMANDED**

**DECLARATION OF GARY R. SORDEN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

1. My name is Gary R. Sorden. I am over 18 years of age, of sound mind, capable of making this declaration, and personally acquainted with the facts stated herein. I have personal knowledge of the facts in this declaration, and they are true and correct.

2. I am an attorney licensed in the state of Texas and have been retained to represent Geigtech East Bay LLC d/b/a J Geiger ("J Geiger") in this matter.

3. Exhibit 1 to this declaration are J. Geiger's claim charts comparing the claims 9 and 15 of United States Patent No. 9,237,821 and Defendant Lutron Electronics Co. Inc.'s ("Lutron") Palladiom Shading System.

4. Exhibit 2 to this declaration is a true and correct copy of the file Palladiom\_Shading\_System\_Brochure.pdf cited in J Geiger's infringement charts and available from Lutron's website at:

[http://www.lutron.com/TechnicalDocumentLibrary/Palladiom\\_Shading\\_System\\_Brochure.pdf](http://www.lutron.com/TechnicalDocumentLibrary/Palladiom_Shading_System_Brochure.pdf)

5. The URL from which Exhibit 2 was downloaded was last visited on June 5, 2018.

6. Exhibit 3 to this declaration is a true and correct copy of the file Palladiom\_Shading\_System\_Spec\_Submittal.pdf cited in J Geiger's infringement charts and

available from Lutron's website at:

[http://www.lutron.com/TechnicalDocumentLibrary/Palladiom\\_Shading\\_System\\_Spec\\_Submittal.pdf](http://www.lutron.com/TechnicalDocumentLibrary/Palladiom_Shading_System_Spec_Submittal.pdf)

7. The URL from which Exhibit 3 was downloaded was last visited on June 5, 2018.

8. J Geiger's infringement charts also contain true and correct cropped screen shots from this video on YouTube: [https://youtu.be/p\\_n5AMkXp\\_s?t=177](https://youtu.be/p_n5AMkXp_s?t=177). This URL was last visited on June 5, 2018.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2018

/s/ Gary R. Sorden  
Gary R. Sorden